

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

**LEN STOLER, INC. d/b/a LEN STOLER
AUDI,**

Plaintiff,

- against -

**VOLKSWAGEN GROUP OF AMERICA,
INC. d/b/a AUDI OF AMERICA, INC.,**

Defendant.

Case No. 1:15CV1659-TSE/JFA

**PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Plaintiff Len Stoler, Inc. d/b/a Len Stoler Audi ("Plaintiff" or "Stoler"), by counsel, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 56 for partial summary judgment on Stoler's Amended Complaint, with regard to the First, Second, and Third Causes of Action and against Volkswagen Group of America, Inc. d/b/a Audi of America Inc.'s Counterclaim. As explained in detail in Stoler's accompanying Memorandum, there is no genuine issue as to any material fact, and Stoler is entitled to judgment as a matter of law.

Accordingly, upon due consideration and in the interests of justice, Stoler's Motion for Partial Summary Judgment should be granted.

DATED: August 12, 2016

Respectfully submitted,

/s/ Barbara S. Wahl

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August, 2016, I served a true and accurate copy of the foregoing by filing it electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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